

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Eastern District of Texas

**FILED**

FEB 12 2016

Clerk, U.S. District Court  
Texas Eastern

United States of America

v.

Dominic Dennard Green

*Defendant(s)*

Case No.

6:16MJ 17

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2/9/2016 in the county of Cherokee in the  
Eastern District of Texas, the defendant(s) violated:

*Code Section*

18 USC 2113(a)(b) and (c)

*Offense Description*

Bank Burglary

This criminal complaint is based on these facts:

See attached affidavit from Special Agent Patrick Boland

☒ Continued on the attached sheet.



*Complainant's signature*

S.A. Patrick Boland, Federal Bureau of Investigation

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 2-12-16



*Judge's signature*

City and state: Tyler, Texas

John D. Love, United States Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**  
**AND ARREST WARRANT**

I, Patrick Boland, after being duly sworn, depose and state:

**A. Purpose and Background**

1. I am a Special Agent for the Federal Bureau of Investigation (FBI) and have been so employed for ten years. I am currently assigned to the Tyler Resident Agency of the FBI Dallas Field Division and have been so assigned for the past six years. I was previously assigned to the FBI Milwaukee Field Division.
2. As an FBI agent, my responsibilities include enforcing federal laws as set forth in the United States Code (U.S.C.), including Title 18, U.S.C., Section 2113, the federal bank robbery and incidental crimes statute. The specific violation this affidavit pertains to is Title 18 U.S.C., Section 2113, (a)(b) and (c), bank burglary.
3. I have conducted numerous investigations of criminal enterprises and individual criminal activity involving a wide variety of federal criminal violations under Title 18 of the United States Code. I was previously assigned to a multi-agency task force which specialized in investigating bank robbery and related crimes. I have testified in federal court numerous times concerning violations of Title 18, Section 2113. I have conducted numerous debriefings of defendants, witnesses, informants, and other persons concerning bank robberies and related federal criminal offenses.
4. I am currently engaged in a joint investigation with the Jacksonville Police Department. I submit this affidavit in support of a criminal complaint and arrest warrant

for DOMINIC DENNARD GREEN, black male, date of birth September 5, 1985, for a violation of Title 18, U.S.C. Section 2113(a)(b) and (c), bank burglary.

5. I am personally familiar with the facts and circumstances set forth in this affidavit through my own investigation and observations, from information provided to me by other law enforcement agencies, and from my review of bank surveillance video.

**B. Probable Cause**

6. For the limited purpose of establishing probable cause for a criminal complaint and arrest warrant, not all evidence known to me regarding the subject of this criminal complaint or the scope of this criminal activity will be presented in this affidavit.

7. During the early morning hours of February 9, 2016, a witness in Jacksonville, Cherokee County, within the Eastern District of Texas, was passing by the Austin Bank branch, 1700 S. Jackson, Jacksonville, Texas, 75766, a bank whose deposits, including the money contained within the ATM on the bank premises, were insured by the Federal Deposit Insurance Corporation (FDIC).

8. The witness called 911 to report a possible bank burglary after the witness observed several individuals leaving the ATM area of the bank carrying items. The witness provided 911 dispatchers with a suspect vehicle description. A patrol officer from the Jacksonville Police Department spotted the suspect vehicle on U.S. Highway 69 in downtown Jacksonville and attempted to conduct a traffic stop on the vehicle. The vehicle initially stopped and the patrol officer was able to make contact with the driver. The suspect vehicle then fled from the traffic stop and a chase ensued.

9. During the chase, the four occupants of the vehicle bailed out of the vehicle and fled on foot. After a foot pursuit, patrol officers were able to arrest one of the occupants of the vehicle, whom the patrol officer recognized from the attempted traffic stop as the driver of the suspect vehicle, later identified as DOMINIC DENNARD GREEN. There was thousands of dollars cash scattered on the ground behind a building that the suspects had run behind. Jacksonville PD was able to recover over \$7,000 cash from the scene.

10. The aforementioned Austin bank branch confirmed the ATM burglary, a portion of which was captured on bank surveillance cameras. Based on a review of the bank video surveillance, it appears three disguised individuals carrying burglary tools entered the bank premises housing the ATM. The individuals appeared to be dropped off by a fourth suspect, the driver.

11. An audit conducted by Austin Bank determined that the burglars stole over \$30,000 in FDIC insured funds from the bank's ATM system. Additionally, the burglars caused approximately \$35,000 in damage to the bank. A review of the video surveillance showed that the burglars appeared to be well trained, efficient, and knew exactly what to do. The burglars had the bank's surveillance cameras and security system disabled within about 30 seconds. After disabling the bank security system and surveillance cameras, the burglars stayed inside the bank for over 90 minutes working to gain access to the ATM cash drawers.

12. On February 9, 2016, the day of the bank burglary, myself and a Jacksonville Police Department detective conducted an audio/video recorded custodial interview of DOMINIC DENNARD GREEN. Agents read GREEN his rights/Miranda warning aloud

on video and then also had GREEN read an FBI advice of rights form. GREEN signed the form and agreed to be interviewed without an attorney.

13. GREEN advised that he and three accomplices left the Dallas area in the early morning hours on February, 9, 2016, and traveled together in GREEN's vehicle to Jacksonville. The group brought an assortment of tools to use for the burglary of a building. GREEN said he dropped these individuals off at a bank with a green sign in Jacksonville, knowing that they were going to burglarize the bank's ATM system.

14. GREEN advised that he waited in a nearby parking lot for what seemed like a long time until one of his accomplices called him from the bank and said they were ready to be picked up. When GREEN went to pick up his accomplices, GREEN observed somebody driving through the area and became worried they had been spotted.

15. Although they never got time to count it, GREEN knew the burglary had been partially successful because when he picked his accomplices up, GREEN observed that they were carrying at least one cash drawer from the bank's ATM. GREEN confirmed the attempted police chase, bailout, and fleeing on foot until he was caught.

16. GREEN advised that he had seven children by four or five different women to support and that he does burglaries for a living. GREEN advised that he had cash hidden from previous successful burglaries and was saving up to purchase a Chevrolet Corvette. GREEN advised that if he were to be released on bail, GREEN would immediately commit more burglaries because he would need money and burglaries are what he knows.

17. I spoke to "K.F.", senior vice president for security at Austin Bank, who confirmed that the aforementioned Austin Bank branch is FDIC insured. Austin Bank

also confirmed that the ATM at this Austin Bank branch is on the bank premises, and the money contained within the ATM and supporting building is in the care, custody, and control of the bank and is also FDIC insured.

**C. Conclusion**

18. Based on my training and experience, my participation in this investigation, and the information set forth herein, I believe probable cause exists that on February 9, 2016, DOMINIC DENNARD GREEN and accomplices, did knowingly and intentionally burglarize the Austin Bank, an FDIC insured institution, did take away with intent to steal, money belonging to the bank, and did receive, possess, conceal, or store money which had been taken from a bank in violation of the federal bank robbery and incidental crimes statute, all in violation of Title 18 U.S.C., Section 2113, (a)(b) and (c), bank burglary.

The foregoing is true and correct to the best of my knowledge and belief.



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Patrick Boland, Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence at Tyler, Texas on this the 12<sup>th</sup> day of February, 2016.



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John D. Love  
United States Magistrate Judge